

U.S. DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
FILED

MAR 21 2006
P. 44

CLERK, U.S. DISTRICT COURT
By _____ **Deputy**

VS.

Defendant/Counter Plaintiff

and

vs.

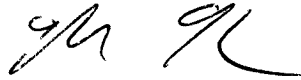
MICHAEL BURNS,
Third Party Defendant

**CIVIL ACTION NO.
4:06-CV-0159 A**

Counter and Third Party Plaintiff JACQUELIN DESIGNS ENTERPRISES, INC. AND DU

A. September 23, 2005 – December 9, 2005 Tara Business Consulting Invoices and Jacquelin Designs Enterprises, Inc. Check Stubs [Exhibit A – 1 to Exhibit A – 12]

Respectfully submitted,



Marc D. Katz
State Bar No. 00791002
Peggy L. Facklis
State Bar No. 24007167

JENKENS & GILCHRIST,
A Professional Corporation
1445 Ross Avenue, Suite 3200
Dallas, Texas 75202-2799
(214) 855-4500
(214) 855-4300 (fax)

**ATTORNEYS FOR COUNTER AND THIRD
PARTY PLAINTIFFS**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument was forwarded, *via hand delivery*, to attorney for Plaintiff/Counter-Defendant and Third Party Defendant, George R. Schultz, Schultz & Associates, One Lincoln Center, 5400 LBJ Freeway, Suite 1200, Dallas, Texas 75240 on this 21st day of March, 2006.





Tara Business Consulting
5932 Oakcrest Road
Dallas, Texas 75243

Consultation Services For Emerging Companies
 972-567-8958

DATE: Sept. 23, 2005
 INVOICE # 129A

POSTED
 SEP 27 2005

BILL TO:
 Jacquelin Designs Enterprises, Inc.
 4951 Airport Parkway, Suite 802B
 Addison, Texas 75001

FOR: Professional
 Services
 9/17-9/23

972-490-0101

DESCRIPTION	DATE	HOURS	RATE	AMOUNT
Met with MB at compay offices to go over Shop Control Pro and ways to set up diamond tracking reports for MJM and diamond vendors.	9/17/2005	4.25	100.00	\$ 425.00
Read through various parts of SCP manual and ascertain main attributes of system for reboot and regin for JDE. Made up list of questions for Rick at MPI Systems in CT, designer of SCP.	9/18/2005	1.00	100.00	100.00
Resolve Issues of FE406 with MP and DC. Find other units in safe. Set up Monster account, pay for same, begin reviewing resumes that came in and filter for next level. Instruct MD to set up phone interviews. Call Richard at SCP and discuss questions. Discuss issue with respect to Sam's credit with JGS, advise. MP dis on remaining Costco repairs and fg inventory needing purchase orders. Discuss with JGS regarding position structure and how to process QC on repair vs scrap of Costco returns and redraw process and duties for new person.	9/19/2005	6.75	100.00	675.00
Receive correspondence from JK regarding consultants visit and review with JGS agenda in detail and prepare response for HK. Respond to HK and acknowledge issue with dates. Discuss with JGS in detail and prepare initial strategy for handling. Get with MB and DC regarding center stone issue with MJM and JDE on 3/4 carats. Attend production meeting. Review e mails from Jessica and send over findings of our meeting for her to follow up. Rewrite DC agreement and have JGS send to him for acknowledgement. Review shipment notification from Stuller. Conduct phone interviews of likely candidates.	7 25	100.00	725.00	
Conduct additional phone interviews. Vanous correspondence from Jessica, LNF etc. regarding production issues. Discuss HK consultant arrival and departure dates and make final schedule with HK and JGS. Go over initial presentation contents with JGS and strategize on how to carve up information requirements. Produce skeletal outline of new information checklist.	9/15/2005	5.75	100.00	575.00
Reset production meeting. Get with MD to set up interviews for Monday and Tuesday. Review Alvin Wirthin correspondence regarding patents and follow up with JGS on same. Go through in detail the patents and trademarks to determine ownership and breakout for the Oct 10 presentations.	9/20/2005	5 25	100.00	525.00
Go through detail of request for information from HK regarding consultants visit and meet with JGS to determine what is advisable to prepare. Drill into the segments of information and break apart to come up with internal checklist for information and distribute. Have JGS approve and discuss same. Finalize interview schedule for Monday and Tuesday with MD. Discuss and strategize labor visit for Wed with MD. Discuss and outline/return various go forward license agreement strategies for JE, JGS, and JDE.	9/21/2005	6.00	100 00	600 00
Expenses - Monster Application Fee-paid by KM	9/19/2005	1.00	395 00	395.00
	37 25		SUBTOTAL	\$ 4,020.00
			TAX RATE	0 00%
			SALES TAX	-
			Remaining Retainer	\$ -
			TOTAL	\$ 4,020.00

Make all checks payable to **Kent Mansfield**
 Total due upon receipt TAX ID 455-41-1140

THANK YOU FOR YOUR BUSINESS!

Exhibit A - 1

DATE	INVOICE NO.	COMMENT	AMOUNT	DISCOUNT	NET AMOUNT
9/26/05	129	Consulting 09/17-09/2	4,020.00	.00	4,020.00
CHECK: 012412 09/30/05 Kent Mansfield				TOTAL	4,020.00

117LN1 Creative Document Solutions To Reorder Forms. 866-389-4252

PRINTED IN U.S.A



Tara Business Consulting
5932 Oakcrest Road
Dallas, Texas 75243

Consultation Services For Emerging Companies
 972-567-8958

POSTED

SEP 26 2005

DATE: Sept. 23, 2005
 INVOICE # 129

FOR: Professional
 Services
 9/17-9/23

BILL TO:

Jacquelin Designs Enterprises, Inc.
 4951 Airport Parkway, Suite 802B
 Addison, Texas 75001

972-490-0101

DESCRIPTION	DATE	HOURS	RATE	AMOUNT
Met with MB at compay offices to go over Shop Control Pro and ways to set up diamond tracking reports for MJM and diamond vendors.	9/17/2005	4.25	100.00	\$ 425.00
Read through various parts of SCP manual and ascertain main attributes of system for reboot and regin for JDE. Made up list of questions for Rick at MPI Systems in CT, designer of SCP.	9/18/2005	1.00	100.00	100.00
Resolve Issues of FE406 with MP and DC. Find other units in safe. Set up Monster account, pay for same, begin reviewing resumes that came in and filter for next level. Instruct MD to set up phone interviews. Call Richard at SCP and discuss questions. Discuss issue with respect to Sam's credit with JGS, advise. MP dis on remaining Costco repairs and fg inventory needing purchase orders. Discuss with JGS regarding position structure and how to process QC on repair vs scrap of Costco returns and redraw process and duties for new person.	9/19/2005	6.75	100.00	675.00
Receive correspondence from JK regarding consultants visit and review with JGS agenda in detail and prepare response for HK. Respond to HK and acknowledge issue with dates. Discuss with JGS in detail and prepare initial strategy for handling. Get with MB and DC regarding center stone issue with MJM and JDE on 3/4 carats. Attend production meeting. Review e mails from Jessica and send over findings of our meeting for her to follow up. Revise and send to JGS new PCH/JGS agreement. Rewnte DC agreement and have JGS send to him for acknowledgement. Review shipment notification from Stuller. Conduct phone interviews of likely candidates.		8.25	100.00	825.00
Conduct additional phone interviews. Various correspondence from Jessica, LNF etc regarding production issues. Discuss HK consultant arrival and departure dates and make final schedule with HK and JGS. Go over initial presentation contents with JGS and strategize on how to carve up information requirements. Produce skeletal outline of new information checklist.	9/15/2005	7.25	100.00	725.00
Reset production meeting. Invoice JDE by PCH and receive in inventory to PCH. Deliver same to BD. Get with MD to set up interviews for Monday and Tuesday. Set up PCH beginning balance sheet and ending financial statements for 9/30/05. Review Alvin Wirthin correspondence regarding patents and follow up with JGS on same. Go through in detail the patents and trademarks to determine ownership and breakout for the Oct 10 presentations.	9/20/2005	7.50	100.00	750.00
Go through detail of request for information from HK regarding consultants visit and meet with JGS to determine what is advisable to prepare. Drill into the segments of information and break apart to come up with internal checklist for information and distribute. Have JGS approve and discuss same. Finalize interview schedule for Monday and Tuesday with MD. Discuss and strategize labor visit for Wed with MD. Discuss and outline/return various go forward license agreement strategies for JE, JGS, and JDE.	9/21/2005	6.50	100.00	650.00
Expenses - Monster Application Fee-paid by KM	9/19/2005	1.00	395.00	395.00
		42.50	SUBTOTAL	\$ 4,545.00
			TAX RATE	0.00%
			SALES TAX	-
			Remaining Retainer	\$ -
			TOTAL	\$ 4,545.00

DUE UPON RECEIPT -

Make all checks payable to **Kent Mansfield**
 Total due upon receipt TAX ID 455-41-1140

THANK YOU FOR YOUR BUSINESS!

Exhibit A - 3



Tara Business Consulting
5932 Oakcrest Road
Dallas, Texas 75243

Consultation Services For Emerging Companies
 972-567-8958

POSTED
 OCT 05 2005

DATE: Sep. 30, 2005
 INVOICE # 131

BILL TO:
 Jacquelin Designs Enterprises, Inc.
 4951 Airport Parkway, Suite 802B
 Addison, Texas 75001

FOR: Professional
 Services
 9/26 - 9/30

972-490-0101

DESCRIPTION	DATE	HOURS	RATE	AMOUNT
Trademark Issues. Russ Schultz - Mark, discuss True by Jacquelin trademark and filing of same. Review and advise JGS and notify Kathleen to search for other marks. Interview 2 candidates. Stuller follow up.	9/26/2005	6.00	100.00	\$ 600.00
Trademark issues continued. Sales by Cust/Brand/Channel model development. Production meeting. Prepare and review comments for MJM and release same to Jessica.	9/27/2005	7.00	100.00	700.00
Phone interview with 2 candidates. COD shipment issue with Stuller get redirected here. Letter prep to ABT and review balances. Review add'l resumes from web MJM JOE Order issues. Dale Carver process issues on diamonds. Go through Costco repair analysis from Lisa N. Discuss additional changes to schedule for consultants with JGS.	9/28/2005	7.25	100.00	725.00
Out Sick	9/29/2005	0.00	100.00	
Interview Heidi Arnett (2) and prepare offer letter and send same. Production meeting and follow up	9/30/2005	3.50	100.00	350.00
	23.75	SUBTOTAL		\$ 2,375.00
		TAX RATE		0.00%
		SALES TAX		-
		Remaining Retainer		\$ -
		TOTAL		\$ 2,375.00

DUE UPON RECEIPT -

Make all checks payable to **Kent Mansfield**
 Total due upon receipt. TAX ID 455-41-1140

THANK YOU FOR YOUR BUSINESS!

Exhibit A - 4

DISCLAIMER :

This e-mail is confidential to the addressee. It may also be legally privileged. If you are not the addressee and/or the intended recipient of this e-mail, you may not copy, forward, disclose or use any part of it, and please delete it and its attachment(s) and all copies from your system and notify the sender immediately by return e-mail. Please also do not disclose the contents or take any actions in reliance upon the information contained in the communication or any attachment.

Internet communications cannot be guaranteed to be timely, secure, error or virus-free. The sender does not accept liability for any errors or omissions.

Exhibit A - 5

10/4/2005

DATE	INVOICE NO.	COMMENT	AMOUNT	Page 8 of 14	Page 14 of 14
09/30/05	131	Consulting 09/26-09/30	2,375.00	.00	2,375.00
CHECK: 012432 10/07/05 Kent Mansfield				TOTAL	2,375.00

7LN1

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PRINTED IN U.S.A.

From: Jacquelin [jacquelin@jacquelin.com]
Sent: Tuesday, November 15, 2005 5:35 AM
To: 'Kent Mansfield'; 'Kathleen Willis'
Subject: RE: kminvoice11-13a.pdf

Approved.
Jags

From: Kent Mansfield [mailto:kentman12@comcast.net]
Sent: Monday, November 14, 2005 12:51 PM
To: 'Kathleen Willis'
Cc: 'Jacquelin Grosser Samuels'
Subject: kminvoice11-13a.pdf

KW,

Thanks for catching me up last week. Here is my invoice through yesterday for the previous week. Jacquelin is very busy dealing with other issues right now, so I'll try and make sure she approves this sometime this week.

Thanks,

Kent



Tara Business Consulting
5932 Oakcrest Road
Dallas, Texas 75243

Consultation Services For Emerging Companies
 972-567-8958

DATE: Nov. 13, 2005
 INVOICE # 143

BILL TO:

Jacquelin Designs Enterprises, Inc.
 4951 Airport Parkway, Suite 802B
 Addison, Texas 75001

FOR: Professional
 Services
 11/7-11/13

972-490-0101

DESCRIPTION	DATE	HOURS	RATE	AMOUNT
Receive/review prelim. Financials for Oct. for JDE. Meet with JAGS (via phone) re: Schultz & Associates - set up meeting and get comm out for additional work on filings. Draw up new order and prepare JDE purchase order for new Magic order and get Stuller moving on components. Create and send out consignment agreement for MJM to AB and JAGS for review. Discuss with JAGS final strategy for Thai inventory visit and whether or not to use TH in role. Review problem with customs on Thai inbound shipment and write response for customs broker. Construct e-mail for the "consult" group updating them with Oct financials and send out.	11/7/2005	6.50	100.00	\$ 650.00
Discuss inventory audit with DC and get paperwork straight. Deal with DOV rejects and get understanding of the problem and discuss with JAGS. Receive and review AB's comments on consignment agreement for MJM. Finalize and resend. Draw up MNDAs for the consult group to sign before allowing them access to JAGS employment terms. Revise open order ship date report for communication back to MJM. Ghost write e-mail for delivery to Nandor and send all to JAGS. Review final.	11/8/2005	6.00	100.00	600.00
Review JAG communication to Seeberger regarding MNDAs and the consult group and advise same on next steps. Follow up on orders with Stuller and come up with stocking quantity for JDE on magic components. Strategy meeting with Nola to redirect her on final items that can't be reconciled. Come up with outline summary of areas where there are discrepancy and summarize. Prepare check for Stuller and confirm purchase order from JDE for stocking components with JG.	11/9/2005	6.00	100.00	600.00
Follow up on LEO Schachter balance with HK and inform of next steps to Tony Chk				
Work on new open order status report for communication to MJM with JAGS include mandatory ship dates and comments to Nandor's changes. Publish this to both JAGS and Dallas staff. Work on Dallas Mfg order status and insert mandatory ship dates based on customers tolerance. E mail to Dallas staff. check with BG regarding molds and models for micro magic bezels and chain stops confirm existence of waxes and ability to manufacture.	11/10/2005	5.00	100.00	500.00
10am meeting with Nola. Finalize report for MJM and JAGS, edit, revise, and e mail. Work on MRP to finalize including executive summary comments, spreadsheet modification and e mail to JAGS / KW. Prepare check for Russ Schultz and deliver along with scope of work for additional filing maintenance. E mail Nandor about Kazto orders and timing. E mail LNF regarding Jacquelin's inability to contact Costco buyer. E Mails to MJM personnel regarding lack of communication. Draw up prony list for Best Cast and give to MP	11/11/2005	5.00	100.00	500.00
Multiple e-mail correspondence with JAGS. Follow up on her issues from Thailand.	11/13/2005	1.00	100.00	100.00
	29.50		SUBTOTAL	\$ 2,950.00
			TAX RATE	0.00%
			SALES TAX	-
			Remaining Retainer	\$ -
			TOTAL	\$ 2,950.00

POSTED
 NOV 17 2005

DUE UPON RECEIPT -

Make all checks payable to Kent Mansfield
 Total due upon receipt TAX ID 455-41-1140

THANK YOU FOR YOUR BUSINESS!

Exhibit A - 8

INVOICE NO.		COMMIT	AMOUNT	DISCOUNT	NET AMOUNT
Case 3:06-cv-00159-Aud Document 39-11/17/05		11/17/05	2,950.00	.00	2,950.00
CHECK: 012589 11/17/05 Kent Mansfield				TOTAL	2,950.00

LR2117LN1

Creative Document Solutions To Reorder Forms: 866-389-4252

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Tara Business Consulting
5932 Oakcrest Road
Dallas, Texas 75243

Consultation Services For Emerging Companies
 972-567-8958

DATE: Dec. 9, 2005
 INVOICE # 156

BILL TO:
 Jacquelin Designs Enterprises, Inc.
 4951 Airport Parkway, Suite 802B
 Addison, Texas 75001

FOR: Professional
 Services
 12/5-12/9

972-490-0101

DESCRIPTION	DATE	HOURS	RATE	AMOUNT
Send off new model to Stuller for new part number and mold. Revise MRP package and find cash flow error. Send revised numbers to Philippe Hostetler along with brief analysis of changes. Send MRP to HK along with request for guidance on inventory issue. Finalize review with DC regarding bombing and confirm shipment of chems to complete. Get with Heidi and go through projections for December given orders that slipped from Nov.	12/5/2005	6.75	95.00	\$ 641.25
Look through Thien Po issue of EJPA balance and discuss with KW and JGS Strategy re. response. Go through planned payments schedule with KW and discuss pros cons of factoring and costs. Look over B of NY loan document and place call to Bonnie David Im. Multiple comms with Wolfgang regarding company charter and BOI application in Bangkok. Review of lease space. <u>Continued work on integration plan for JDE Thailand. Create biz plan for Hong Kong entity.</u> Review Zale bal with KW discuss late EDI entries. Finalize cash flow forecast to match projections given to PH and other board members. Send to KW for comments.	12/6/2005	7.00	95.00	665.00
Create checklist for Wolfgang regarding lease, furniture, equipment, etc. that will be needed. Update on BOI effort. Franz Fuch to help. <u>Lunch with Russ Schultz and Jacquelin. Follow up with trademark issues on Mini by Jackie G., Kazlo, and Du Nouveau. Also, copy license agreement on Magic and Patents and review terms. Make several trips to retrieve chems for DC</u>	12/7/2005	8.25	95.00	783.75
Comm with KW regarding Oro increase penalty on interco debt of 1%. Comm with JAGS on Thailand issues and Wolfgang arrival next week. Discuss with MD confidentiality agreement for contractor.	12/8/2005	1.00	95.00	95.00
Deal with Wolfgang flight alternatives and communicate same to him. Employee purchase plan development. New hire approval and creation of job description. Review comms from Russ Schultz and begin review of budget for next 90 days on trademark issues for JDE. Relagate issues of JGS personal ownership of trademarks to JGS for her discussion with Russ. Receive and analyze comms from Tony Chik regarding LC renewals for B of NY. Create corres to Tony regarding rate issues and show comparable rates for similar deals. Get image copies needed for updating of trademarks for JDE on Minis, etc.	12/9/2005	6.00	95.00	570.00
		29.00	SUBTOTAL	\$ 2,755.00
			TAX RATE	0.00%
			SALES TAX	-
			Remaining Retainer	\$ -
			TOTAL	\$ 2,755.00

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 DEC 15 2005

DUE UPON RECEIPT -

Make all checks payable to **Kent Mansfield**
 Total due upon receipt: TAX ID 455-41-1140

THANK YOU FOR YOUR BUSINESS!

Exhibit A - 10



Tara Business Consulting
5932 Oakcrest Road
Dallas, Texas 75242

Consultation Services For Emerging Companies
 972-567-8958

DATE: Dec. 2, 2005
 INVOICE # 155

BILL TO:

Jacquelin Designs Enterprises, Inc.
 4951 Airport Parkway, Suite 802B
 Addison, Texas 75001

FOR: Professional
 Services
 11/28-12/2

972-490-0101

DESCRIPTION	DATE	HOURS	RATE	AMOUNT
Final review and send customs form letter to MB as requested. Review plat magic needs and relay same to JG for ordering. Review issue with DF on magic special order with discrepant on 1/2 vs. 3/4 carat and resolved with DC. Go through portfolio of trademarks owned by company with lawyer and forward related documents. Set meeting to occur within one week. Get with DF on low margin magic special order and resolved issue on stone cost. Receive pro forma invoice docs from MJM regarding inbound shipments, discuss same with staff regarding timing of outbound and purchase order status	11/28/2005	5.75	95.00	\$ 546.25
Meet with KW regarding cash flow forecast. Go through AP and AR and recommend changes to payment schedule. Discuss factoring as strategy for end of Dec. Review correspondence from Phillippe H. regarding upcoming US board meeting and need for prelim data from JDE and forward response on same after inquiring to KW on timing. Tom Lucas conference call on lease proposal for airport pkwy. Get with Authentix to see if they can source sodium cyanide for us. Go pick up a sample of methal cyanide from them to test. Test with DC and reject. Prepare revisions to latest MJM diamond inventory list for Nolas review and upcoming new engagement.	11/29/2005	5.50	95.00	522.50
Report interim sales to JAGS and recommendation on outstanding Costco and BBB order to hit \$2 million. Discuss same with KW and resolve. Picked up additional material from Authentix but tests failed on bomb. Renew efforts at establishing account with Fishcer Science and get account set up on ccard. Get DC to order needed material. Communication with DC on MSDS and needed safety gear to complete process. Begin analysis on JDE Thailand and set up model for tracking procedures and document processing.	11/30/2005	5.25	95.00	498.75
Written offer prep to Tom Lucas on final lease deal then conference call on same. Continue work on JDE Central process diagram and give same to JAGS for review. General duties regarding orders in/out and follow up with Mary on several issues for building. Review revised cash flow forecast from KW and analyze for detail. Format separate sheet to calculate total cash projections based upon projections given to US board members and work remainder of 2006 numbers for balance sheet	12/1/2005	7.50	95.00	712.50
Receive preliminary financial numbers, review and analyze and wrap up report to P Hostetler and other board members and forward same. Receive and review detail diamond reports from MJM on final return and analyze. Forward findings to Nola. Get DC and NZ communicating about physical inventory in the coming week and process. Model issues on magic pieces and forwarding of same to Stuller for new part. Prepare new magic clasp samples for delivery to JAGS. JAGS request for coordination of custom piece for Mary Forte. Get with Wolfgang to and give dimensions for signature plates as well as checking with DC and JG to confirm materials for production. Continue work on JDE Central budget template and process design	12/2/2005	6.00	95.00	570.00
	30.00		SUBTOTAL	\$ 2,850.00
			TAX RATE	0.00%
			SALES TAX	-
			Remaining Retainer	\$ -
			TOTAL	\$ 2,850.00

DUE UPON RECEIPT -

Make all checks payable to **Kent Mansfield**
 Total due upon receipt. TAX ID 455-41-1140

THANK YOU FOR YOUR BUSINESS!

POSTED
 DEC 13 2005

Exhibit A - 11

DATE	INVOICE NO	COMM	AMOUNT	DISCOUNT	NET AMOUNT
12/02/05	Case 4:06-cv-00153-AT Document 30 Filed 03/21/06 Page 14 of 14 PageID 612	Consulting 11/28-12/2	2,850.00		2,850.00
12/09/05	156	12/5-12/9 consulting	2,755.00	.00	2,755.00
CHECK: 012700 12/16/05 Kent Mansfield				TOTAL	5,605.00